

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CARLENE BECHEN, ELVIRA
BUMPUS, RONALD BIENDSEIL, LESLIE W.
DAVIS, III, BRETT ECKSTEIN, GLORIA
ROGERS, RICHARD KRESBACH, ROCHELLE
MOORE, AMY RISSEEUW, JUDY ROBSON,
JEANNE SANCHEZ-BELL, CECELIA
SCHLIEPP, TRAVIS THYSSEN, CINDY
BARBERA, RON BOONE, VERA BOONE,
EVANJELINA CLEERMAN, SHEILA
COCHRAN, MAXINE HOUGH, CLARENCE
JOHNSON, RICHARD LANGE, and GLADYS
MANZANET,

Plaintiffs,

Case No. 11-CV-00562
JPS-DPW-RMD

TAMMY BALDWIN, GWENDOLYNNE MOORE and
RONALD KIND,

Intevenor-Plaintiffs,

Members of the Wisconsin Government
Accountability Board, each only in his official
capacity: MICHAEL BRENNAN, DAVID
DEININGER, GERALD NICHOL, THOMAS
CANE, THOMAS BARLAND, and TIMOTHY
VOCKE, and KEVIN KENNEDY, Director and
General Counsel for the Wisconsin Government
Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E.
PETRI, PAUL D. RYAN, JR., REID J. RIBBLE,
and SEAN P. DUFFY.

Intevenor-Defendants.

VOCES DE LA FRONTERA, INC.,
RAMIRO VARA, OLGA VARA,
JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

v.

Case No. 11-CV-1011
JPS-DPW-RMD

Members of the Wisconsin Government
Accountability Board, each only in his official
capacity: MICHAEL BRENNAN, DAVID
DEININGER, GERALD NICHOL, THOMAS
CANE, THOMAS BARLAND, TIMOTHY
VOCKE, and KEVIN KENNEDY, Director
and General Counsel for the Wisconsin
Government Accountability Board,

Defendants.

AFFIDAVIT OF MARIA S. LAZAR IN SUPPORT OF DEFENDANTS'
RESPONSE TO PLAINTIFFS' JOINT MOTION

STATE OF WISCONSIN)
) ss.
DANE COUNTY)

MARIA S. LAZAR, being first duly sworn under oath, states as follows:

1. I am an Assistant Attorney General for the State of Wisconsin and am one of the counsel of record for the defendants in this above-captioned matter.
2. Attached, as Exhibit A, is a true and accurate copy of Senator Mark Miller's letter to Senator Scott Fitzgerald, dated March 23, 2012.

3. Attached as Exhibit B, is a true and correct copy of Representative Peter Barca's March 22, 2012 press release.

4. I am making this Affidavit in support of the defendants' Response to Plaintiffs' Joint Motion to Schedule a Half-Day Hearing on Remedies and to Set a Complementary Briefing Schedule and defendants' Provisional Motion for Stay of Injunction.

s/Maria S. Lazar
MARIA S. LAZAR

Subscribed and sworn to before me
this 23rd day of March, 2012.

s/Connie Anderson
Notary Public, State of Wisconsin
My commission expires 1/11/2015



MARK MILLER
WISCONSIN STATE SENATOR

P.O. Box 7882 Madison, WI 53707-7882

BY HAND DELIVERY

March 23, 2012

Senator Scott Fitzgerald
State Capitol, Room 211 South
P.O. Box 7882
Madison, WI 53707-7882

Dear Senator Fitzgerald,

As of yesterday, the Eastern District of Wisconsin invalidated the redistricting map in Act 43 as an unlawful violation of the federal Voting Rights Act.

With the Senate now equally divided between 16 members of each party, I believe now is the time to act to pass a bipartisan compromise that will be fair to all Wisconsinites. The Senate cannot simply ignore the Court's command to set aside the Senate's "contentious atmosphere" and create new legislative districts. As of yesterday, there are no valid legislative districts for the Senate or the Assembly.

As the Court has noted repeatedly, redistricting is the job of the legislature, not the judiciary. Now is not the time to shirk our legislative responsibilities and simply rely on the Court to do our job for us. The time to stop defying the Court's rulings and draw new maps is now.

Democrats stand ready to pass a bipartisan redistricting bill. I look forward to your response.

Sincerely,

Mark Miller
State Senator
16th Senate District

EXHIBIT A

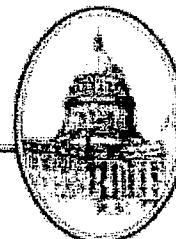
Phone: (608) 266-9170 Fax: (608) 266-5087 Toll Free: 1 (877) 862-4825 E-mail: sen.miller@legis.wi.gov

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Official Press Release from the office of Rep. Peter Barca, Assembly Democrats Leader

Peter W.
BARCA

Minority Leader • Wisconsin State Assembly



FOR IMMEDIATE RELEASE

Date: March 22, 2011

Contact: Melanie Conklin, 608.266.5504

Court throws out GOP Act 43 redistricting maps as unconstitutional

Barca calls for new process to be open and respect public and communities

MADISON – Assembly Democratic Leader Peter Barca (D-Kenosha) released the following statement today in response to the Eastern District of Wisconsin court's decision enjoined Act 43 on redistricting, saying it is unconstitutional. It will require the Legislature to revisit redistricting in a less partisan, extreme manner:

"Federal judges found that Republicans broke the law. We all knew the process for redistricting was flawed, the court has now enjoined the maps because the outcome was also flawed.

"Following an unprecedented, extreme, secretive process, federal judges state that more than one million citizens of Wisconsin have been 'needlessly moved' in a fashion that was 'needlessly secret.'

"Now that Act 43 does not exist, we need to immediately begin to redraw the maps in a manner that is fully open and transparent and does not, in the words of the court, 'needlessly move' more than million citizens of Wisconsin.

"Republicans created blatantly partisan redistricting maps designed to protect them from accountability. They hid the process from the taxpayers, even signing unprecedented secrecy oaths with their taxpayer-funded attorneys. This took the partisanship to extreme levels never before seen in this process.

EXHIBIT B

Brandt, Karen J (15243)

From: ecfmaster@wied.uscourts.gov
Sent: Friday, March 23, 2012 5:07 PM
To: ecfmaster@wied.uscourts.gov
Subject: Activity in Case 2:11-cv-00562-JPS-DPW-RMD Baldus et al v. Brennan et al Affidavit

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United States District Court

Eastern District of Wisconsin

Notice of Electronic Filing

The following transaction was entered by Lazar, Maria on 3/23/2012 at 5:07 PM CDT and filed on 3/23/2012

Case Name: Baldus et al v. Brennan et al
Case Number: 2:11-cv-00562-JPS-DPW-RMD
Filer:
WARNING: CASE CLOSED on 03/22/2012
Document Number: 215

Docket Text:

AFFIDAVIT of Maria S. Lazar *in Support of Defendants' Response to Plaintiffs' Joint Motion.*
(Attachments: # (1) Exhibit A - Miller Letter - 032312, # (2) Exhibit B - Barca Press Release - 032212)(Lazar, Maria)

2:11-cv-00562-JPS-DPW-RMD Notice has been electronically mailed to:

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